



U.S. Department of Justice

*United States Attorney
District of Massachusetts*

Main Reception: (617) 748-3100

*United States Courthouse, Suite 9200
1 Courthouse Way
Boston, Massachusetts 02210*

April 25, 2012

BY FIRST-CLASS MAIL AND ECF (w/out attachments)

Kevin J. Reddington, Esq.
1342 Belmont Street, Suite 203
Brockton, MA 02301

Robert M. Goldstein, Esq.
20 Park Plaza, Suite 1000
Boston, MA 02116

Re: United States v. Robert A. George, 11-10201-NMG

Dear Counsel:

We write to inform you that in the upcoming trial, the government expects to offer testimony from Ryan J. Talbot, Special Agent, Internal Revenue Service - Criminal Investigation Division ("IRS-CID"), at least some of which may be considered expert testimony.¹

Special Agent Talbot's expert qualifications are set forth on the attached resumé. In addition, in October 2011, Special Agent Talbot testified as an expert witness in federal court in Baltimore, Maryland in the case of United States v. James Bestman, Crim. No. CCB-10-0163. The transcript of Special Agent Talbot's expert testimony in that trial is attached. Special Agent Talbot is also the author of an article, "A cautionary tale: An IRS agent details one laundering scam," which appeared in the September 2006 edition of Money Laundering Alert. That article is also attached.

Special Agent Talbot's anticipated testimony at your client's trial will include the techniques and methods used by individuals who do not want their transactions traced by law enforcement. His testimony will cover concealment, currency transactions and government forms and filing requirements relating to financial transactions conducted with currency, including examples and hypothetical situations relating to concealment and other objects of money laundering. His testimony

¹ While the government takes the position that not all of the below-described testimony is expert testimony, the government nevertheless makes the following disclosures, pursuant to Federal Rule 16(a)(1)(G) and Fed R. Evid. 702.

will also cover the Bank Secrecy Act, associated regulations, reporting requirements and associated forms and reports.

Based on his training, knowledge and experience, Special Agent Talbot will testify that it has become increasingly difficult to transfer large amounts of cash, due to all of the reporting requirements. Additionally, Special Agent Talbot is expected to testify that one of the aspects of money laundering is to get currency into the banking system for ease of transfer and to attempt to convert it to what appears to be legitimate money.

Please let us know if you have any questions.

Very truly yours,

CARMEN M. ORTIZ
United States Attorney

By:

/s/ Zachary R. Hafer
Zachary R. Hafer
Laura J. Kaplan
Assistant U.S. Attorneys

enclosure(s)

cc: Christine Patch, Clerk to the Honorable Nathaniel M. Gorton
[by ECF, without enclosures]

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system (without enclosures) will be sent electronically to the registered participants as identified in the Notice of Electronic Filing.

/s/ Zachary R. Hafer
Zachary R. Hafer
Assistant U.S. Attorney

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